

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications

Docket No. MC96-3

ANSWER OF THE OFFICE OF THE CONSUMER ADVOCATE
TO INTERROGATORY USPS/OCA-T400-29
OF UNITED STATES POSTAL SERVICE
REDIRECTED TO WITNESS SHERMAN (USPS/OCA-T400-29)
(NOVEMBER 6, 1996)

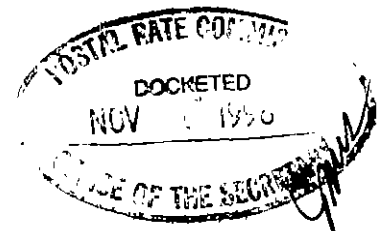
The Office of the Consumer Advocate hereby submits the answer of Roger Sherman to interrogatory USPS/OCA-T400-29 (October 25, 1996), redirected from witness Collins. The interrogatory is stated verbatim and is followed by the response.

Witness Sherman is out of town and his declaration will be filed later.

Respectfully submitted,

Emmett Rand Costich

EMMETT RAND COSTICH
Assistant Director
Office of the Consumer Advocate



ANSWER OF OCA WITNESS ROGER SHERMAN
TO REDIRECTED INTERROGATORY USPS/OCA-T400-29

USPS/OCA-T400-29. At page 22, lines 21 - page 23, line 14 of your testimony, you discuss witness Patelunas's "speculative reasons" for the cost difference between postal cards and private cards cited in his response to OCA/USPS-T5-11, Tr. 2/252-53. You state that postal cards "are more compatible with postal processing equipment than post cards." You also state that "[a]ddress hygiene may be better."

- a. Please confirm that in his response to interrogatory OCA/USPS-T5-11, Tr. 2/252-53, witness Patelunas also states that it is possible "that postal cards are misidentified as private cards during data collection." If you do not confirm, please explain in detail.
- b. Do you have any basis to dispute witness Patelunas's statement that it is possible "that postal cards are misidentified as private cards during data collection?" If so, please explain in detail.

A. a.-b. Please see my response to USPS/OCA-T100-28.

DECLARATION

I, Roger Sherman, declare under penalty of perjury that the answer to redirected interrogatory USPS/OCA-T400-29 of the United States Postal Service is true and correct, to the best of my knowledge, information and belief.

Executed

Nov. 8, 1996

Roger Sherman

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POSTAL RATE DIVISION
OFFICE OF THE SECRETARY

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

A handwritten signature in cursive script, reading "Emmett Rand Costich".

EMMETT RAND COSTICH
Attorney

Washington, D.C. 20268-0001
November 6, 1996